PRODUCE OF U.S.A.

Fresh Farm Products, Inc.

P.O. BOX 1453, AMERICUS, GEORGIA 31709

December 15, 1997

Dockets Management Branch (HFA-305)
Food & Drug Administration
12420 Parklawn Drive - Rm 1-23
Rockville, MD 20857

7833 '97 DEC 22 P2:24

RE: Docket #97N-0451

This letter is in response to the DRAFT guidelines on microbial safety of produce recently promulgated by the Food & Drug Administration and presented at a series of Public Hearings held during the week of December 1-5, 1997. While I commend an initiative which would enhance consumer confidence in the safety of US grown fruit and vegetables, I have several serious concerns regarding the process and the DRAFT guidelines,

(1) The rapid pace of hearings, publication and comments may overlook and/or ignore research currently in process which was initiated by FDA. The National Advisory Committee on Microbiological Criteria for Foods (NACMCF) is addressing this food safety issue. However, due to the complexity of our industry and lack of sound research information as to potential sources microbiological hazards this research process must follow a systematic process. It cannot be hurried or short cutted. Any effort to put in place federal standards on how to grow, harvest and handle commodities should have a scientific basis which we currently do not have.

(2) The produce industry is actively engaged in efforts to assure the microbiological safety of fresh fruit and vegetables. In working on this project our industry has found there is too little sound scientific knowledge regarding the sources of microbial hazards. Until sufficient research is available, I feel it is ridiculous to give the consumer a false sense of security and diminish their confidence when there is another food safety outbreak allegedly caused by produce.

(3) Once FDA issue guidelines, the marketplace will rapidly make the guidelines mandatory through contract provisions. This will require me, and all other US producers that want to sell our product, to expend resources to adjust our production practices; adjustments which may have no appreciable effect on improving food safety.

(4) We live and work in a global marketplace. Most growers compete against imported products, but FDA has proposed no time line or strategy for having these guidelines apply to our 'trading partner countries.' Again..putting us on an unlevel playing field with our 'trading partners.' Plus, if the US forces our trading partners to follow a document not based on science, the requirement will inevitably be challenged as a non-tariff trade barrier.

Our industry has a long history of providing the highest quality, safest, most economical produce in the world. To continue this tradition . . .FDA should be concerned with pushing for real scientific understanding, not offer the quick fix of a public relations perception campaign.

Sincerely,

John McNeill Sr.

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97N-0451

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TO: Jennie Butler

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FROM: Joyce Saltsman

Heard you needed copies of comments #31-38 of Docket 97N 0451. Here they are. Let me know what else you need.. Joyce..